

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

THE EAMON FOUNDATION,

Plaintiff,

v.

TIME IN, LLC d/b/a TIME IN APPAREL
and CHARLES A. GOLDBERG,

Defendants.

No. 2:20-CV-01250-AJS

JURY TRIAL DEMANDED

ELECTRONICALLY FILED

JOINT MOTION FOR ENTRY OF CONSENT DECREE

Plaintiff The Eamon Foundation (“Eamon”), Defendant Time In, LLC d/b/a Time In Apparel (“Time In”), and Defendant Charles A. Goldberg (“Goldberg”), by and through their undersigned counsel, jointly and respectfully move this Court for approval and entry of the Consent Decree attached hereto as **Exhibit A**, averring in support as follows:

1. On August 21, 2020, Eamon filed a Complaint [ECF No. 1] against Time In and Goldberg asserting claims for injunctive relief and declaratory relief for trademark infringement, unfair competition, dilution of trademarks, and unjust enrichment.

2. Eamon also that day filed a Motion for Preliminary Injunction (“Motion”) [ECF No. 3] and a Brief in Support thereof [ECF No. 4].

3. On August 24, 2020, this Court entered a Scheduling Order [ECF No. 8] which, *inter alia*, scheduled a hearing on Eamon’s Motion for September 11, 2020.

4. In order to at least temporarily, and perhaps permanently, resolve the above-captioned litigation, the parties respectfully request that the Court approve and enter the proposed Consent Decree attached hereto as **Exhibit A** and incorporated herein by reference.

WHEREFORE, the parties respectfully request that this Court approve and enter the Consent Decree attached hereto as **Exhibit A**.

Respectfully submitted,

Dated: August 28, 2020

BUCHANAN INGERSOLL & ROONEY PC

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